

# EXHIBIT 2

## Doug Handshoe

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**From:** Hollie\_Miller@mssd.uscourts.gov on behalf of Gargiulo\_Chambers@mssd.uscourts.gov  
**Sent:** 09/14/2016 2:52 PM  
**To:** foodvacation Canada  
**Cc:** bob.galloway@butlersnow.com; dgunn@watkinseager.com; earning04@gmail.com; bw@gulfcoastlawyer.com; luther.munford@butlersnow.com; meta.danzey@butlersnow.com; jdyal@balch.com; ellen.kennedy@hoganlovells.com; lisa.bonanno@hoganlovells.com  
**Subject:** Re: 15-cv-382 request for additional time

Mr. Leary and Mr. Perret:

Please be advised that the Court does not accept motions by email. You must file a motion with the Clerk of Court. You must also copy all parties and counsel in communications with the Court. You did not copy Plaintiff or counsel for National Geographic on the email requesting an extension. Ex parte communications with the Court are prohibited.

Hollie Miller  
Law Clerk to Magistrate Judge John C. Gargiulo  
U.S. District Court, Southern District of Mississippi  
(228) 563-1755

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From: foodvacation Canada <[foodvacation@gmail.com](mailto:foodvacation@gmail.com)>  
To: [gargiulo\\_chambers@mssd.uscourts.gov](mailto:gargiulo_chambers@mssd.uscourts.gov)  
Cc: [bob.galloway@butlersnow.com](mailto:bob.galloway@butlersnow.com), [dgunn@watkinseager.com](mailto:dgunn@watkinseager.com)  
Date: 09/12/2016 04:13 PM  
Subject: 15-cv-382 request for additional time

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Honorable Judge Gargiulo's Chambers:

I am a party in Handshoe v. Perret, et. al., 15-cv-382.

I just spoke with your office by telephone, and this email was suggested.

Vaughan Perret and I had hired local counsel--Robert Wolford--and he has entered an appearance and requested additional time to file a responsive pleading, including objecting to personal jurisdiction and under Fed.R.Civ.P 12(b)(4) and 12(b)(5). The extended deadline given by Judge Gargiulo is September 15, 2016.

We have been unable to reach Mr. Wolford since September 2, 2016. We have tried email, phone calls, and phone messages. Apparently, the contact number available for him on the docket is no longer his law firm. We do not know if he is sick or has had some other emergency.

Having never reviewed any draft submissions with Mr. Wolford, we do not now believe that a responsive pleading can be submitted in time, and we believe we will either have to seek out new counsel or proceed for the time being pro se. We are both in Canada, and this could take some time. For the same reason, we cannot timely make this request via post.

We are therefore requesting additional reasonable time to find new counsel, locate Mr. Wolford, and/or compose a *pro se* pleading. We ask for an additional 21 days.

Sincerely,

Charles Leary (and Vaughan Perret)

(I have cc'd counsel with email addresses available on the docket)